

DOA:

## UNITED STATES DISTRICT COURT

for the  
District of Arizona

United States of America )

v. )

Alfonso Garcia Vega )

Case No. MJ 25-3078

A #092 323 413 )

Defendant**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about February 2, 2023, in Maricopa County, in the District of Arizona, the defendant violated Title 8, United States Code, Section 1326(a), an offense described as follows:

Alfonso Garcia Vega, an alien, was found in the United States at or near Phoenix, Arizona, in the District of Arizona, after having been previously denied admission, excluded, deported, and removed from the United States at or near San Ysidro, California, on or about September 11, 2020, and not having obtained the express consent of the Attorney General or the Secretary of Homeland Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a), and enhanced by (b)(1). I further state that I am a Supervisory Detention and Deportation Officer.

This criminal complaint is based on these facts:

**See Attached Statement of Probable Cause Incorporated By Reference Herein**

AUTHORIZED BY: AUSA Chong-Ho Chung for AUSA Megan Kelly

☒ Continued on the attached sheet.

**CHONG-HO  
CHUNG** Digitally signed by  
CHONG-HO CHUNG  
Date: 2025.02.02  
12:35:41 -07'00'

Sworn to telephonically.

Date: February 2, 2025

City and state: Phoenix, Arizona

**KEITH R KEI** Digitally signed by KEITH R KEI  
Date: 2025.02.02 12:37:29 -07'00'

*Complainant's signature*

Keith Keish,  
Supervisory Detention and Deportation  
Officer

*Printed name and title*

*Michael T. Morrissey*

*Judge's signature*

Michael T. Morrissey  
United States Magistrate Judge

*Printed name and title*

### **STATEMENT OF PROBABLE CAUSE**

I, Supervisory Detention and Deportation Officer Keith Keish, declare under penalty of perjury that the following is true and correct.

1. I am a Supervisory Detention and Deportation Officer. I have learned the facts recited herein from direct participation in the investigation and from the reports and communications of other agents and officers.
2. On or about February 2, 2023, Immigration and Customs Enforcement (ICE) in Phoenix, Arizona received information from the Law Enforcement Support Center (LESC) that Alfonso Garcia Vega was unlawfully present in the United States. The LESC investigation was initiated based on a referral from the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) due to a historical gun purchase denial.
3. Immigration history checks revealed Alfonso Garcia Vega to be a citizen of Mexico and a previously deported alien. Garcia Vega was removed from the United States to Mexico through San Ysidro, California, on or about September 11, 2020, pursuant to a final order of removal issued by an immigration judge. There is no record of Garcia Vega in any Department of Homeland Security database to suggest that he obtained permission from the Secretary of the Department of Homeland Security to return to the United States after his last removal. Garcia Vega's immigration history was matched to him by electronic fingerprint comparison.

4. Criminal history checks revealed that on or about June 3, 2019, Alfonso Garcia Vega was convicted of Reentry of Removed Alien, a felony offense, in the United States District Court, District of Arizona. Garcia Vega was sentenced to 24 months imprisonment and 36 months of supervised release. Garcia Vega's criminal history was matched to him by electronic fingerprint comparison.
5. On February 2, 2025, at approximately 10:30 am, the Phoenix ICE Fugitive Operations Team began surveillance on Alfonso Garcia Vega's suspected residence located at 10222 N 16<sup>th</sup> Ave, in Phoenix, Arizona. At approximately 10:55 am, Deportation Officer Brian Fitzgerald positively identified Garcia Vega walking around in the front yard of the residence. At approximately 11:00 am, ICE officers attempted to consensually encounter Garcia Vega while he was on the sidewalk in front of his residence. As the ICE vehicles were approaching, Garcia Vega ran back inside his residence. The identity of Garcia Vega was compared to the most recent immigration photo on record taken on September 11, 2020. Furthermore, at approximately 11:20 am, Deportation Officer Prunty spoke with a younger male who came outside of the residence and confirmed that Garcia Vega is inside the house located at 10222 N 16<sup>th</sup> Ave in Phoenix, Arizona.
6. For these reasons, this affiant submits that there is probable cause to believe that on or about February 2, 2023, Alfonso Garcia Vega, an alien, was found in the United States at or near Phoenix, Arizona, in the District of Arizona, after having been previously denied admission, excluded, deported, or removed from the United States at or near San

Ysidro, California, on or about September 11, 2020, and not having obtained the express consent of the Secretary of the Department of Homeland Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a), and enhanced by (b)(1).

7. This affidavit was sworn to telephonically before a United States Magistrate Judge legally authorized to administer an oath for this purpose. I have thoroughly reviewed the affidavit and the attachments to it, and attest that there is sufficient evidence to establish probable cause that the defendant violated Title 8, United States Code, Section 1326(a), and enhanced by (b)(1).

**KEITH R KEI** Digitally signed by KEITH R KEI  
Date: 2025.02.02 12:38:01 -07'0

---

Keith Keish,  
Supervisory Detention and Deportation Officer

Sworn to telephonically on  
February 2, 2025

*Michael T. Morrissey*

---

Michael T. Morrissey  
United States Magistrate Judge